

MASSOOD & BRONSNIK, LLC

JOSEPH A. MASSOOD
ANDREW R. BRONSNIK *

COUNSELLORS AT LAW

50 PACKANACK LAKE ROAD EAST
Wayne, New Jersey 07470-6663
(973) 696-1900
Fax (973) 696-4211

Email: ABRONSNIK@MASSOODLAW.COM

Reply to Wayne

KEVIN J. SAVAGE +
BRENDAN H. MORRIS ^
ALLISON T. KURTZ
DANIELLE L. VERGA ^
KIMBERLY A. KOPP

PARALEGALS
ELIZABETH BABITSCH
DARA K. SIERRA

PASSAIC OFFICE
647 Main Ave, Suite 203
Passaic, NJ 07055
973-779-4200
973-777-7977-F

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

*NJ, NY, DC and MD Bars
^ NJ and NY Bars
+ NJ, NY, DC and WA Bars

April 18, 2013

Via Facsimile: (973) 776-7865

Honorable Cathy Waldor, U.S.M.J.
United States District Court
District of New Jersey
M.L. King, Jr. Federal Building and Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Montvale Surgical Center, LLC a/s/o Stephen Dare, et al. v. IBEW
Local Union 164
Civil Action No.: 2:12-cv-3732*

Dear Judge Waldor:

Please allow this letter to confirm the amended scheduling order discussed during the status conference call on April 17, 2013 for the above-referenced case.

1. Affirmative Plaintiff Expert Reports will be due on June 15, 2013;
2. Responsive Expert Reports will be due on July 30, 2013;
3. All expert discovery must be completed by September 15, 2013.

We thank Your Honor for your time and consideration.

Respectfully,



ANDREW R. BRONSNIK, ESQ.

ARB/jda
cc: Seth Ptasiwicz (Via Facsimile)

SO ORDERED

s/Cathy L. Waldor
Cathy L. Waldor, U.S.M.J.

Date: 4/24/13